

# EXHIBIT J

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

AMERICAN DIABETES ASSOCIATION, :	CIVIL ACTION
	:
Plaintiff, :	
	:
v. :	NO. 2:13-cv-03720-MSG
	:
THE FRISKNEY FAMILY TRUST, LLC, :	
et al., :	
	:
Defendants. :	

**NOTICE OF FILING OF REGISTRAR CERTIFICATE**

Plaintiff American Diabetes Association, by and through its undersigned counsel, hereby gives notice of the filing of the attached Registrar Certificate through which GoDaddy.com, LLC ("GoDaddy") tenders to the Court control and authority over the registration and use of the domain names AMERICANDIABETES.COM and AMERICANDIABETESUPPLIES.COM.

This Civil Action relates to, in part, Defendants' registration and use of the domain names AMERICANDIABETES.COM and AMERICANDIABETESUPPLIES.COM and the infringement of Plaintiff's mark AMERICAN DIABETES ASSOCIATION caused thereby. (See generally Pl.'s Compl. [D.I. 1].)

As contemplated by the Anticybersquatting Consumer Protection Act, codified, as amended, in 15 U.S.C. §§ 1114, 1117 and 1125, and as further provided in GoDaddy's terms of service agreement with its registrants and the dispute policies incorporated therein, GoDaddy has provided the attached Registrar Certificate, which tenders control and authority over the registration and use of the domain names AMERICANDIABETES.COM and AMERICANDIABETESUPPLIES.COM, to the Court.

GoDaddy, by its Registrar Certificate, shall maintain the *status quo ante* with respect to the above-referenced domain names and will not permit any future transfer, suspension, or other modification of the domain name registrations until further order of this Court.

Respectfully submitted,

CAESAR, RIVISE, BERNSTEIN,  
COHEN & POKOTILOW, LTD.

Dated: July 10, 2013

By /SGuerriero/  
Manny D. Pokotilow (PA ID# 13310)  
Email: <mdpokotilow@crbcp.com>  
Salvatore Guerriero (PA ID# 83680)  
Email: <sal@crbcp.com>  
1635 Market Street  
12th Floor – Seven Penn Center  
Philadelphia, PA 19103  
Tel: (215) 567-2010

Attorneys for Plaintiff  
American Diabetes Association

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the within Notice of Filing of Registrar Certificate is being electronically filed with the Clerk of Court via the ECF for the U.S. District Court for the Eastern District of Pennsylvania on July 10, 2013. The undersigned further certifies that true copies of the same are being served upon the parties of record, on this same day, by electronic mail and first class mail, postage prepaid:

Robert L. Friskney  
The Friskney Family Trust, LLC  
1605 E Classical Boulevard  
Delray Beach, FL 33445  
<rfriskney@gmail.com>

Robert L. Friskney  
MedVantage Plus, LLC  
6560 W. Rogers Circle #19  
Boca Raton, FL 33487  
<rfriskney@gmail.com>

Robert L. Friskney  
1605 E Classical Boulevard  
Delray Beach, FL 33445  
<rfriskney@gmail.com>

/SGuerriero/  
Salvatore Guerriero

Case 2:13-cv-03720-MSG Document 7 Filed 07/10/13 Page 3 of 4

1  
2  
3 In The United States District Court for the Eastern District Of Pennsylvania  
4 American Diabetes Association  
5 Plaintiff Registrar's Certificate  
6  
7 vs. Case No. 13-3720  
8 The Friskney Family Trust, LLC, Medvantage  
9 Defendants.  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

I, David Castano, a representative of GoDaddy.com, LLC, registrar of Internet domain names under the top level domains .com, .org. and .net, among others, hereby declare:

1. I have personal knowledge of the facts stated herein, and would testify to such facts if so called to testify.

2. GoDaddy.com, LLC is the registrar of the domain names at issue in this case, AMERICANDIABETES.COM and AMERICANDIABETESUPPLIES.COM.

3. On June 28<sup>th</sup>, 2013, GoDaddy.com, LLC received written notification of a filed, stamped copy of the Complaint in the instant case.

4. Per the Complaint filed at this Court, GoDaddy.com, LLC placed the Domain Names on registrar lock, thus preventing the Domain Names from being transferred, modified or otherwise managed or manipulated.

Case 2:13-cv-03720-MSG Document 7 Filed 07/10/13 Page 4 of 4

5. Furthermore, GoDaddy.com, LLC will not modify the status of the Domain Names unless and until instructed to do so by Order of the court in the instant case.

6. Therefore, the Domain Names should be construed to be under the dominion and control of the court until such time as GoDaddy.com, LLC receives further instruction with regard to the Domain Names.

7. This Registrar's Certificate shall expire automatically, and control and authority regarding the registration of the Domain Names shall revert to GoDaddy.com, LLC: (i) 14 calendar days from the date of this Registrar's Certificate, unless this Declaration has been filed with the Court during that period and GoDaddy.com, LLC has received a file-stamped copy; or (ii) upon GoDaddy.com, LLC's receipt of an order of the Court dismissing all claims concerning the registrant's contractual rights to register or use the subject Domain Names.

8. I declare under penalty of perjury that the foregoing is true and correct.

**DATED** this July 8<sup>th</sup>, 2013

GoDaddy.com, LLC

By: John Doe Disputes Administrator